

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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KENRICK A. JENKINS, :
Plaintiff, : Case No.:
v. :
CREDIT ONE BANK, N.A., :
Defendant. :
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NOTICE OF REMOVAL

COMES NOW Defendant, Credit One Bank, N.A., (“Defendant”), and for Removal of the above-styled cause to this Court, respectfully state:

1. On or about October 26, 2022, an action was commenced against Defendant in the District Court County of Nassau, First District, Civil Part entitled *Kenrick A. Jenkins v. Credit One Bank, N.A.*, under Index No.: CV-9150-22. A copy of the Summons and Complaint therein was served on Defendant on December 1, 2022.
2. This Notice of Removal is being filed within 30 days of the date upon which Defendant received a copy of the Plaintiff’s Summons and Complaint pursuant to § 303 of the Limited Liability Company Law.
3. A true and accurate copy of the Summons and Complaint in this case is attached hereto as Exhibit A.
4. Plaintiff’s Complaint alleges that Plaintiff is an individual residing in Nassau County, New York.
5. Defendant, Credit One Bank, N.A. is a company with its principal place of business in Las Vegas, NV.

6. The Summons and Complaint alleges the action is brought under the Fair Credit Reporting Act, 15 U.S.C. § 1681, et seq. As such, this Court has Federal question jurisdiction over this action pursuant to 28 U.S.C. § 1331.

7. This case is a civil action which may be removed to this Court by Defendant under the provisions of 28 U.S.C. §§ 1331 and 1441, in that Plaintiff alleges the controversy arises under 15 U.S.C. § 1681.

8. Concurrently, Defendant has provided written notice of this Notice of Removal to Plaintiff, filing a copy with the District Court County of Nassau, First District, Civil Part as required by 28 U.S.C. § 1446(d).

WHEREFORE, Defendant prays that the Court assume jurisdiction of this cause and proceed with it to completion, and to enter such orders and judgments as may be necessary to protect its jurisdiction or as justice may require.

Dated: December 19, 2022

THE SALVO LAW FIRM, P.C.

By: /s/ Cindy D. Salvo
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